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11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 ELECTRONIC FRONTIER FOUNDATION,	)	Case No. 10-CV-4892-RS
	)	
15 Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO CONTINUE ALL DATES</b>
16 vs.	)	<b>FOR PARTIES' CROSS MOTIONS</b>
	)	<b>FOR SUMMARY JUDGMENT BY</b>
17 DEPARTMENT OF JUSTICE,	)	<b>ONE WEEK</b>
	)	
18 Defendant.	)	[CIV. L.R. 6-2]
	)	

20  
21 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties, by and through their  
22 undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court  
23 grant a one-week extension to all dates in the briefing schedule previously submitted and signed by  
24 the Court on February 7, 2012 (Dkt 34). The new schedule as proposed by the parties is as  
25 follows:  
26

27 Defendant DOJ and its components DEA, DOJ Criminal Division  
28 and FBI move for summary judgment.

March 1, 2012

1	Plaintiff files opposition and cross-moves for summary judgment.	March 29, 2012
2		
3	Defendant files reply and opposition to Plaintiff's motion.	April 12, 2012
4	Plaintiff files reply in support of motion for summary judgment.	April 26, 2012
5	Hearing on cross motions.	May 10, 2012

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7 The requested changed will minimally affect the present schedule for the case because it

8 proposes continuing all dates, including the hearing date on the parties' cross motions for summary

9 judgment, by one week. In accordance with Civil L.R. 6-2(a), this stipulation is supported by the

10 Declaration of Nicholas Cartier, counsel for Defendant, filed herewith and a proposed order below.

11 The parties have previously stipulated to a briefing schedule (Dkt. 28) and to two

12 adjustments to that briefing schedule, one to accommodate the Defendant (Dkt. 32) and the other to

13 accommodate the Plaintiff (Dkt. 34). Defendant seeks the current one-week extension to allow its

14 three components (Criminal Division, DEA and FBI) to complete final work on their complicated

15 and lengthy *Vaughn* indexes and declarations. In addition to the complexity of the declarations and

16 indexes, this extension is warranted given the absence for portions of this week of certain key

17 agency personnel involved in finalizing the declarations and indexes. Plaintiff consents to the

18 extension.

19

20 The parties respectfully request that the schedule above be adopted in place of the schedule

21 previously proposed.

22

23 DATED: February 16, 2012

/s/ Nicholas Cartier  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2012, I caused a copy of the foregoing to be served on Plaintiff via the Court's ECF system.

/s/ Nicholas Cartier  
NICHOLAS CARTIER

**GENERAL ORDER NO. 45(X) CERTIFICATION**

I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in the filing of this document.

/s/ Nicholas Cartier  
NICHOLAS CARTIER

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 2/17/12

  
Hon. Richard Seeborg  
United States District Judge